

EXHIBIT 11

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

MARIA ANDRADE, et al.,) Case No.
) 3:18-cv-06743-SK
Plaintiff,)
)
vs.)
)
AMERICAN FIRST FINANCE, INC.,)
et al.,)
)
Defendants.)
_____)

VIDEO-RECORDED VIDEOCONFERENCE
DEPOSITION OF JOHN REGINALD BRITT
RULE 30(b)(6) OF AMERICAN FIRST FINANCE, INC.
Friday, September 10, 2021
Volume I

Reported by:
ROCHELLE HOLMES
CSR No. 9482
Job No. 4756868
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1 the plaintiff.

2 MS. HINTON: Alicia Hinton also representing
3 plaintiff.

4 MR. THREADCRAFT: Joshua Threadcraft on
5 behalf of the defendant. 10:04:40AM

6 MR. TOPOR: And Jeff Topor on behalf of the
7 defendant and the witness.

8 THE VIDEOGRAPHER: Thank you. Will the court
9 reporter please swear in the witness.

10
11 JOHN REGINALD BRITT,
12 having been duly administered an oath in accordance
13 with CCP 2094, was examined and testified as follows:

14
15 EXAMINATION

16 BY MR. GREEN:

17 Q Good morning, Mr. Britt. Could you state and
18 spell your full name for the record, please?

19 A Sure. It's John, J-O-H-N, Reginald,
20 R-E-G-I-N-A-L-D, Britt, B-R-I-T-T. 10:05:17AM

21 Q I understand you go by Reggie Britt. Is it
22 okay if we use that for you today, please?

23 A Yes. That's the name I go by. I prefer
24 that.

25 Q Thank you. 10:05:32AM

1 My name is Robert Green. I'm attorney for
2 Maria Andrade and I'll be taking your deposition today.

3 Are you aware that you're being deposed today
4 in the case of Maria Andrade versus American First
5 Finance, Inc.? 10:05:50AM

6 A I am.

7 Q And are you represented by an attorney for
8 purposes of this deposition?

9 A I am.

10 Q And who is that? 10:05:56AM

11 A Joshua Threadcraft.

12 Q Is he there in the room with you?

13 A He is.

14 Q Is anyone else in the room with you?

15 A No. 10:06:09AM

16 Q And are you currently employed at American
17 First Finance?

18 A I am.

19 Q And what is your position, sir?

20 A I'm the chief technology officer. 10:06:18AM

21 MR. GREEN: All right. I'd like to put on
22 the record a couple of stipulations. The parties have
23 agreed that this deposition is to be taken by video
24 teleconference on oral examination before an officer or
25 officers certified and authorized by law to record 10:06:37AM

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1 A Sure.

2 Q I guess actually you have to pull it up,
3 you've got to go back and click on the top exhibit,
4 Plaintiff Exhibit 39.

5 A Okay. 02:37:04PM

6 Q And you found the exhibit and you found Topic
7 No. 7?

8 A I did.

9 Q Okay. You would agree with me, would you
10 not, that American First Finance does not have a 02:37:14PM
11 lender's license in the state of California; correct?

12 A It's my understanding that we do not.

13 Q And what -- what work did you do to inform
14 yourself of information known at American First Finance
15 about this particular topic? 02:37:36PM

16 A I spoke to our in-house counsel about the
17 mechanics of a retail installment sales program.

18 Q And did you do anything else?

19 A No, I did not.

20 Q Did you look at any documents? 02:38:04PM

21 A No, I did not.

22 Q Did you talk to Doug Rippel?

23 A I did not.

24 Q Did you make a determination as -- as to who
25 in the organization made the decision to offer its 02:38:25PM

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CERTIFICATE OF CERTIFIED SHORTHAND REPORTER

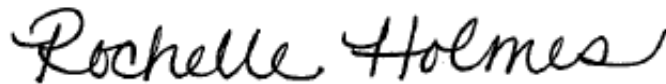
I, Rochelle Holmes, the undersigned, a Certified Shorthand Reporter of the State of California, do hereby certify:

That the foregoing proceedings were taken before me via videoconference; that any witnesses in the foregoing proceedings, prior to testifying, were administered an oath; that a record of the proceedings was made by me using machine shorthand which was thereafter transcribed under my direction; that the foregoing transcript is a true record of the testimony given.

Further, that if the foregoing pertains to the original transcript of a deposition in a Federal Case, before completion of the proceedings, review of the transcript [X] was [] was not requested.

I further certify I am neither financially interested in the action nor a relative or employee of any attorney or any party to this action.

IN WITNESS WHEREOF, I have this date subscribed my name: September 29, 2021.



Rochelle Holmes

CSR No. 9482, CCRR No. 0123